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June 9, 2021

VIA ECF

Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007

Granted.
June 11, 2021
Denise Cote

Re: *TransPerfect Global, Inc. v. Lionbridge Technologies, Inc., et al.*,
Case No. 1:19-cv-3283-DLC

Dear Judge Cote:

Defendants respectfully request authorization to file under seal Exhibit 1 attached to Defendants' response to TransPerfect's June 7, 2021 letter motion.

Exhibit 1 is an email chain between counsel for TransPerfect and counsel for Defendants, which extensively references and quotes documents and deposition testimony regarding client contracts and revenues, business strategies, and other topics, which have been designated Confidential or Highly Confidential by TransPerfect, Defendants, and third parties under the Court's June 3, 2020 Order Regarding Confidential Discovery Material (ECF No. 78).

Defendants' response to TransPerfect's letter motion references the full content of this email chain, and Defendants request that the email chain be sealed in its entirety. In the alternative, Defendants request leave of the Court to file a redacted version of this email chain. Pursuant to Your Honor's Individual Practices, we have contemporaneously filed under seal in the ECF system and electronically related to this motion an unredacted version of Exhibit 1.

We thank the Court for its consideration of this request.

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Respectfully submitted,

/s/ Aaron Marks

Aaron Marks, P.C.

cc: All Counsel of Record (via ECF)